



**PATENT** 

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

Applicant:

BATES ET AL.

Application: METHOD AND COMPUTER PROGRAM PRODUCT FOR IDENTIFYING

HYPERTEXT LINKS IN DOCUMENT PRINTOUTS

Serial No.:

09/292,444

Filing Date: April 15, 1999

Art Unit:

2176

RECEIVED

Examiner:

Rachna Singh

FEB 1 9 2003

Case:

RO998-222

Technology Center 2600

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Honorable Commissioner Of Patents And Trademarks **Box AF** Washington, D.C. 20231

## APPEAL BRIEF TRANSMITTAL

Sir:

An Appeal Brief for Applicants is being submitted herewith in triplicate. Please charge the Deposit Account No. 09-0465 of International Business Machine Corporation in the amount of \$320.00 for the fee for filing a brief in support of the appeal (37 CFR §1.17(c) fee code 1402).

The Commissioner of Patents and Trademarks is hereby authorized to charge any additional fees or credit any overpayment in connection with the filing of the above-referred to Appeal Brief to the Deposit Account No. 09-0465 of International Business Machine Corporation. A duplicate copy of this transmittal is enclosed.

Respectfully submitted,

Joan Permington

Reg. No. 30,885

Telephone: 312/670-0736

One of the Attorneys for Applicants

**Enclosures** 





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APPEAL BRIEF FOR APPLICANTS

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One of the Attorneys for Applicants



## TABLE OF CONTENTS

		<u>Page</u>
(1)	REAL PARTY IN INTEREST	2
(2)	RELATED APPEALS AND INTERFERENCES	2
(3)	STATUS OF CLAIMS	2
(4)	STATUS OF AMENDMENTS	2
(5)	SUMMARY OF INVENTION	2
(6)	ISSUES	8
(7)	GROUPING OF CLAIMS	9
(8)	ARGUMENT	10
	A. INTRODUCTION	10
	B. THE SCOPE AND CONTENT OF THE PRIOR ART	11
	C. THE REJECTION OF 1-3, 6, 10, 12-14, 16 and 17 AS BEING UNPATENTABLE OVER STORK et al., and KOGAN et al. SHOULD BE REVERSED	13
	D. THE REJECTION OF CLAIMS 4, 5, 7, 8 and 9 SHOULD BE REVERSED	20
	E. CONCLUSION	21
(9)	APPENDIX	22
	R DRAWINGS OF INVENTION	27

## TABLE OF CITATIONS

	Page
<u>In re Fine</u> 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988)	14
<u>In re Gordon and Sutherland</u> 733 F.2d 900, 221 USPQ 1125, 1127 (Fed. Cir. 1984)	16
<u>Carl Schenck, A.G. v. Nortron Corp.</u> 713 F.2d 782, 787, 218 USPQ 698, 702 (Fed. Cir. 1983)	. 16
<u>Graham v. John Deere</u> 383 U.S. 1, 148 USPQ 459, (1966)	15
<u>In re John R. Fritch</u> 972 F.2d 1260, 1266, 23 USPQ2d 1780 (Fed. Cir. 1992)	. 16
<u>In re Sernaker</u> 702 F.2d 989, 995-96, 217 USPQ 1, 6-7 (Fed. Cir. 1983)	
<u>In re Young</u> 927 F.2d 588, 18 USPQ2d 1089 (Fed. Cir. 1991)	14
TABLE OF OTHER AUTHORITIES	
35 U.S.C. §103	15





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Honorable Commissioner of Patents and Trademarks Box **AF** Washington, D.C. 20231

#### **APPEAL BRIEF FOR APPLICANTS**

Sir:

This is an appeal of the final rejection of claims 1-10, 12-14 and 16-17 under 35 U.S.C. § 103 mailed September 10, 2002. This rejection was affirmed in the Advisory Action mailed December 3, 2002. For the reasons set forth below, it is

## TABLE OF CONTENTS

		Page
(1)	REAL PARTY IN INTEREST	2
(2)	RELATED APPEALS AND INTERFERENCES	2
(3)	STATUS OF CLAIMS	2
(4)	STATUS OF AMENDMENTS	2
(5)	SUMMARY OF INVENTION	2
(6)	ISSUES	8
(7)	GROUPING OF CLAIMS	9
(8)	ARGUMENT	10
	A. INTRODUCTION	10
	B. THE SCOPE AND CONTENT OF THE PRIOR ART	11
	C. THE REJECTION OF 1-3, 6, 10, 12-14, 16 and 17 AS BEING UNPATENTABLE OVER STORK et al., and KOGAN et al. SHOULD BE REVERSED	. 13
	D. THE REJECTION OF CLAIMS 4, 5, 7, 8 and 9 SHOULD BE REVERSED	. 20
	E. CONCLUSION	21
(9)	APPENDIX	22
	B DRAWINGS OF INVENTION	27

TABLE OF CITATIONS	<u>Page</u>
<u>In re Fine</u> 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988)	14
<u>In re Gordon and Sutherland</u> 733 F.2d 900, 221 USPQ 1125, 1127 (Fed. Cir. 1984)	16
<u>Carl Schenck, A.G. v. Nortron Corp.</u> 713 F.2d 782, 787, 218 USPQ 698, 702 (Fed. Cir. 1983)	. 16
<u>Graham v. John Deere</u> 383 U.S. 1, 148 USPQ 459, (1966)	15
<u>In re John R. Fritch</u> 972 F.2d 1260, 1266, 23 USPQ2d 1780 (Fed. Cir. 1992)	. 16
<u>In re Sernaker</u> 702 F.2d 989, 995-96, 217 USPQ 1, 6-7 (Fed. Cir. 1983)	. 16
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TABLE OF OTHER AUTHORITIES	
35 U.S.C. §103	15

submitted that the Board should reverse the final rejection of claims 1-10, 12-14 and 16-17.

#### (1) REAL PARTY IN INTEREST

The real party of interest is International Business Machines Corporation.

#### (2) RELATED APPEALS AND INTERFERENCES

Applicants' attorney knows of no other appeals or interferences that would have a bearing on the Board's decision in the present appeal.

#### (3) STATUS OF CLAIMS

Claims 1-10, 12-14 and 16 have been finally rejected as unpatentable under 35 U.S.C. § 103 in an office action mailed September 10, 2002. An advisory action mailed December 3, 2002 maintained the final rejection and rejected newly added claim 17. The rejection of each of the claims 1-10, 12-14 and 16-17 has been appealed.

#### (4) STATUS OF AMENDMENTS

An amendment filed after the final rejection was considered but was not deemed to overcome the final rejection of claims 1-10, 12-14 and 16-17. The amendment filed after the final rejection will be entered upon filing an appeal.

## (5) **SUMMARY OF INVENTION**

The claimed invention as recited by independent claims 1, 10, and 17 can best be appreciated and understood with reference to the patent specification (hereinafter, specification page p., line or lines l.) and drawings attached as APPENDIX B (SHEETS 1-5).

The invention is an admittedly novel method, apparatus and computer program product for identifying hypertext links in document printouts. A document to be printed is scanned for identifying local hypertext links within the document. A page location of each identified local hypertext links within the document is computed and stored. Printable objects are sequentially checked to identify each printable object within a hypertext anchor tag. Each identified printable object within a hypertext anchor tag is rendered with a predefined indication of the hypertext link. (p. 2, I. 5-12).

In accordance with features of the invention, a local hypertext link is printed with a page number of the hypertext link within the document. An external hypertext link is printed with a uniform resource locator (URL) for the external hypertext link. The page number of the hypertext link within the document and the uniform resource locator (URL) for the external hypertext link can be printed, for example, in superscript form and bolded or with other highlighting. (p. 2, I. 13-19).

In FIGS. 1A and 1B, there is shown a computer or data processing system generally designated by the reference character 100 for carrying out the document printing method for identification of hypertext references of the preferred embodiment. As shown in FIG. 1, computer system 100 includes a central processor unit (CPU) 102, a read only memory 103, a random access memory 104, a display adapter 106 coupled to a display 108. CPU 102 is connected to a user interface (UI) adapter 110 connected to a pointer device and keyboard 112. CPU 102 is connected to an input/output (IO) adapter 114 connected to a direct access storage device (DASD) 116 and a tape unit 118. CPU 102 is connected to a communications adapter 120

providing a communications function. It should be understood that the present invention is not limited to a computer model with a single CPU, or other single component architectures as shown in FIG. 1. (p. 3, I. 7-20).

As shown in FIG. 1B, computer system 100 includes an operating system 130 and a hypertext link identification printing program 132 of the preferred embodiment. In accordance with features of the invention, a document printout provides identification of internal or local and external hypertext links or references. A table of document data 200 is stored for identifying local hypertext links in a document printout of the preferred embodiment. Various commercially available computers can be used for computer system 100, for example, an IBM personal computer. CPU 102 is suitably programmed by the hypertext link identification printing program 132 to execute the flowcharts of FIGS. 3 and 4. (p. 3, I. 21-30).

In accordance with features of the invention, hypertext links are easily identified when printing documents. For a local or internal hypertext reference with hypertext pointing to a section of the document that is within the same URL (an internal reference), the page number is calculated and inserted into the document printout. The internal hypertext reference text or hot text may be bolded or highlighted in various ways, and the page number is inserted in superscript or in parenthesis or the like. For example, an internal hypertext reference text may be printed as shown in the following Table 1:

Table 1

Roof shingles should be attached with shingle nails (page 15)

where "shingle nails" is the internal hypertext reference text to another portion of this document and the "page 15" is inserted at print time as a superscript, generated by the print function based on the current printer selected and the current font settings, margins, etc. that control the pagination for a given printout. It should be understood that the superscript may further describe where on page 15 where the referenced text appears, such as, to a paragraph number or to a line number. (p. 3, I. 31 - p. 4, I.17). In accordance with features of the invention, for an external hypertext reference with the hypertext pointing to a URL address external to the current document, the URL address is inserted into the printout, for example, in a superscript or other font at the point in the text where the hypertext appears or as a footnote with a footnote reference in the text. For example, an external hypertext reference text may be printed as shown in the following Table 2:

Table 2

You should frame art in quality picture

frames(http://www.Picture\_Frames\_Catalogue.com)

where "picture frames" is hypertext to an external URL and the URL is printed as enclosed in parenthesis and in superscript. The reader is alerted that "picture frames" is hypertext to an external URL, and is also given the URL. (p. 4, I. 18-31).

Footnotes containing the URL addresses can appear either at page bottom or grouped together on a separate page. With the URL addresses printed, the user can note the URL and then logon to the Internet to navigate to the given

addresses if desired. For example, a group of external hypertext references may be printed in a footnote as shown in the following Table 3:

Table 3

picture frames (http://www.Picture\_Frames\_Catalogue.com)
art (http://www.Art\_Gallery\_Catalogue.com)
\* \* \* \* (p. 5, l. 1-14).

Referring now to FIG. 2, document data 200 of the preferred embodiment is illustrated. The document data 200 is a table containing each local anchor name 202 from the <a name="???"> tag together with a page number 204 identified in a particular document to be printed. A print routine of the preferred embodiment, illustrated and described with respect to FIG. 4, first scans the particular document to be printed and determines the page on which all such anchor tags 202 appear. Then the local anchor names 202 and page number 204 are stored in document data 200. When printing the document, when a <a href="???"> is found, the page number is retrieved from document data 200 and printed, for example, as a superscript after the printable data enclosed by the <a href="???">PRINTABLE DATA</a> tag. (p. 5, I. 15-30).

Referring now to FIGS. 3 and 4, exemplary steps are shown for implementing document printing including the identification of hypertext links in document printouts in accordance with the preferred embodiment. In FIG. 3, a main browser flow routine is shown starting at a block 300. An event is obtained as indicated in block 302. Checking whether the event is a print event is performed as indicated in a decision block 304. When a print event is identified, a routine is performed to print the

current page with hypertext link annotation as indicated in block 308. Otherwise, when the event is not a print event, all other browser events are handled in the normal way. (p. 5, l. 31 - p. 6, l. 7).

Referring now to FIG. 4, exemplary steps of the print routine of the preferred embodiment are shown starting at a block 400. First as indicated in block 402, the document is scanned, computing a page location of all <a name="???> tags in the document and the computed page number 204 is stored with the name 202 in the document data. Then sequential operations start with a first printable object as indicated in block 404. A printable object is defined such that only one printable object can be in an anchor tag. Checking for more printable objects is performed as indicated in a decision block 406. When another printable object is identified, checking whether the printable object is within an anchor tag is performed as indicated in a decision block 410. When the printable object is not within an anchor tag, then the printable object is rendered in the normal fashion as indicated in block 412. If true that the printable object is within an anchor tag, then checking for a local hypertext reference is performed as indicated in a decision block 414. When a local hypertext reference is not identified, then checking for an external hypertext reference is performed as indicated in a decision block 416. When an external hypertext reference is identified, then the printable object is rendered in normal fashion as indicated in block 418. Then the URL for the external hypertext reference is rendered, for example, in superscript form and may be printed bold or with other highlighting, as indicated in block 420. When a local hypertext reference is identified at block 414, then the printable object is rendered in

normal fashion as indicated in block 422. Then the name for the local hypertext reference is found in the document data and a page number is printed, for example, in superscript form as indicated in block 424. (p. 6, I. 8-33).

Referring now to FIG. 5, an article of manufacture or a computer program product 500 of the invention is illustrated. The computer program product 500 includes a recording medium 502, such as, a floppy disk, a high capacity read only memory in the form of an optically read compact disk or CD-ROM, a tape, a transmission type media such as a digital or analog communications link, or a similar computer program product. Recording medium 502 stores program means 504, 506, 508, 510 on the medium 502 for carrying out the methods for implementing document printing to identify hypertext links in document printouts of the preferred embodiment in the system 100 of FIGS. 1A and 1B. (p. 6, I. 34 - p. 7, I. 8).

A sequence of program instructions or a logical assembly of one or more interrelated modules defined by the recorded program means 504, 506, 508, 510, direct the computer system 100 for implementing document printing and identifying hypertext links in document printouts of the preferred embodiment. (p. 7, I. 9-13).

#### (6) ISSUES

Whether claims 1-3, 6, 10, 12-14, 16 and 17 are unpatentable over Stork et al., U.S. patent 5,781,914 in view of Kogan et al., U.S. patent 5,809,317 under 35 USC §103?

Whether claim 4, 5, and 8 are unpatentable over Stork et al., U.S. patent 5,781,914 and Kogan et al., U.S. patent 5,809,317 in view of publication Microsoft Word Tutorial "Microsoft Word Basic Features" under 35 U.S.C. § 103?

Whether claim 7 and 9 are unpatentable over Stork et al., U.S. patent 5,781,914 and Kogan et al., U.S. patent 5,809,317 in view of publication Advanced Microsoft Word "Footnotes and Endnotes" under 35 U.S.C. § 103?

#### (7) GROUPING OF CLAIMS

The claims on appeal do not all stand or fall together.

The independent claims at issue here are claims 1, 10, 13, and 17. The claims may conveniently be considered in the following groupings based upon the subject matter.

Claims 1-2, 6 and 14 stand or fall together. Independent claim 1 and dependent claims 2, 6 and 14 may be grouped together in defining a computer implemented method for identifying hypertext links in document printouts.

Claims 3, 12 and 16 stand or fall together. Dependent claims 3, 12 and 16 may be grouped together in further defining a method, apparatus, and computer program product for identifying hypertext links in document printouts where the step of or means for rendering each identified printable object within said hypertext anchor tag with a predefined indication of the hypertext link includes printing a page number or location for each local hypertext link within the document.

Claims 4, 5, 7, 8, and 9 stand or fall together. Dependent claims 4, 5, 7, 8, and 9 may be grouped together in further defining the printing of local and external

hypertext links in a computer implemented method for identifying hypertext links in document printouts.

Each of the independent claims 10, 13 and 17 is separately patentable and do not stand or fall together. Independent claims 10, 13 and 17 respectively define apparatus for identifying hypertext links in document printouts; a computer program product for implementing document printing including identification of hypertext links; and a computer implemented method for identifying hypertext links in document printouts. Each claim 10, 13 and 17 should be individually considered.

#### (8) ARGUMENT

#### A. INTRODUCTION

Applicants respectfully submit that the Examiner's rejection should be reversed because the subject matter of each of independent claims 1, 10, 13, and 17 is patentable over all the references of record. As recited by independent claims 1, 10, 13, and 17, the methods, apparatus and computer program product for identifying hypertext links in document printouts includes means and steps that are not described, nor suggested in the references of record. Applicants respectfully submit that there is no teaching or suggestion in any of the cited references, individually or taken as a whole, to make the claimed invention obvious. Considering the scope and content of the prior art and the subject matter of the Stork et al., U.S. patent 5,781,914 and Kogan et al., U.S. patent 5,809,317, publication Microsoft Word Tutorial "Microsoft Word Basic Features", and publication Advanced Microsoft Word "Footnotes and Endnotes"

requires a conclusion that the final rejections of the pending claims 1-10, 12-14 and 16-17 under 35 U.S.C. § 103 are improper and should be reversed.

#### B. THE SCOPE AND CONTENT OF THE PRIOR ART

Stork et al., U.S. patent 5,781,914 discloses a conversion method and apparatus that allows for converting a hardcopy document into a hyperdocument and vice versa. During hardcopy to hyperdocument conversion, hypertext information stored on the hardcopy document is used to set up links to other documents. During hyperdocument to hardcopy document conversion, hypertext link information is encoded and stored on the hardcopy document. A process is described where a hypertext document is converted into a plain paper document. One embodiment of this process is shown in FIG. 5. The hardcopy document that results contains hypertext link information in machine readable format to enable conversion back into a hypertext document format. Thus, the link information will be available to the user to enable a reversal back into a hypertext document. Referring to FIG. 5, the conversion process begins by creating a bit map of a hyperpage that is currently displayed on the display screen from a screen "dump" (processing block 501). An example of such a document in shown in FIG. 6A. A portion of the bit map is shown in FIG. 6B. Once a bit map has been created, the hyperwords in the bit map are detected (processing block 502). In one embodiment, the hyperwords are detected by using a template. Such a template is shown in FIG. 6D. The bit map locating portions of the bit map are searched with the template, generating correlation values. FIG. 6E illustrates correlation values around the boxed region shown in FIG. 6C. The correlation value indicate whether there is a high

correlation between portions of the document and the template. Once the marked words have been identified, the location and hyperlink information is encoded (processing block 503), the information is formatted into one or more pages (processing block 504), and a hardcopy document is printed having a sidechannel with encoded hyperlink information (processing block 505). In one embodiment, a template may be encoded as well for use in locating active regions.

Kogan et al., U.S. patent 5,809,317 discloses a method and apparatus for relating (called hyperlinking) a region of one document to one or more regions of other documents. This is provided by using a mechanism for linking and embedding objects to establish the endpoints of the hyperlinks (called anchors) together with the creation of intermediate tables which maintain information about relations between regions of documents and attributes of the relationship. When a user selects a region in a document which participates in a relationship, a database program is invoked which displays information about related regions in other documents which may be accessed through the intermediate tables. An auxiliary table maintains information about attributes which may be custom designed by the user, such as author, date of creation, etc. The intermediate tables allow relationships among multiple regions of documents created by different applications. Relationships are bidirectional in that the user can traverse from any region in a document to any other region in the same relationship. In the preferred embodiment, hyperlinks are implemented via four database tables. The first table represents the anchors, that is the endpoints of the hyperlinks. The rows in the anchors table include at least two fields: an internal identifier through which the

embodiment, the link is created using the OLE brand object linking and embedding system available from Microsoft Corporation of Redmond, Wash., however, it can be appreciated by one skilled in the art that other mechanisms for linking and embedding objects in documents and maintaining those links can be used in alternative embodiments, e.g., the NewWave brand system available from Hewlett-Packard). The anchor object represented by a row in the table is embedded using OLE into the document to be hyperlinked. This is shown pictorially in FIG. 5. The dual use of OLE connections for a single anchor overcomes the limitations of the unidirectionality of OLE connections. The embedded anchor object allows the hyperlink application to be activated when users initiate a link traversal. The OLE link from the table entry to the anchor region in the document allows the hyperlink manager to open the appropriate document upon completion of a link traversal.

The publication Microsoft Word Tutorial "Microsoft Word Basic Features" discloses a word processing program enabling text to be displayed in bold or superscript form.

The publication Advanced Microsoft Word "Footnotes and Endnotes" discloses a word processing program enabling text to be displayed in footnote form.

C. THE REJECTION OF CLAIMS 1-3, 6, 10, 12-14, 16 and 17 AS BEING

UNPATENTABLE OVER STORK et al., and KOGAN et al. SHOULD BE REVERSED

The Board should reverse the rejection of claims 1-3, 6, 10, 12-14, 16 and 17 as being unpatentable over Stork et al., and Kogan et al. under 35 U.S.C. § 103.

#### Claims 1-2, 6 and 14 are patentable

Independent claim 1 recites a computer implemented method for identifying hypertext links in document printouts including the steps of scanning a document to be printed and identifying local hypertext links within the document, computing and storing a page location of each identified local hypertext link within the document, sequentially checking printable objects to identify each printable object within a hypertext anchor tag; and rendering each identified printable object within said hypertext anchor tag with a predefined indication of the hypertext link including printing a corresponding uniform resource locator (URL) for each external hypertext link.

The total teachings of Stork et al., and Kogan et al. do not provide any remote suggestion of the recited steps or limitations of the recited computer implemented method for identifying hypertext links in document printouts of claim 1. Thus, claim 1 is patentable.

The prior art of record including Stork et al., and Kogan et al. provides no teaching, suggestion or inference in the prior art as a whole or knowledge generally available to one having ordinary skill in the art to achieve the claimed invention as recited in claim 1. A <u>prima facie</u> case of obviousness is established by presenting evidence that would have led one of ordinary skill in the art to combine the relevant teaching of the references to arrive at the claimed invention. <u>In re Fine</u>, 837 F2d. 1071, 1074, 5 USPQ2d 1596, 1598 (Fed. Cir. 1988). The test for obviousness is what the combined teachings of the references would have suggested to one of ordinary skill in the art. <u>In re Young</u>, 927 F.2d 588, 591, 18 USPQ2d 1089, 1091 (Fed. Cir. 1991). The

machine readable encoded information provided by Stork et al. is not equivalent to nor does not achieve, nor suggest the step of rendering each identified printable object within said hypertext anchor tag with a predefined indication of the hypertext link including printing a corresponding uniform resource locator (URL) for each external hypertext link, as recited in claim 1.

35 U.S.C. § 103 requires that the invention as claimed be considered "as a whole" when considering whether the invention would have been obvious when it was made. Graham v. John Deere, 383 U.S. 1, 148 USPQ 459, 472 (1966). It is applicant's claimed invention which must be considered as a whole pursuant to 35 U.S.C. § 103, and failure to consider the claimed invention as a whole is an error of law.

The Stork et al., and Kogan et al. do not provide for any mechanism or any motivation for sequentially checking printable objects to identify each printable object within a hypertext anchor tag. The Stork et al., and Kogan et al. do not provide for any mechanism or any motivation for rendering each identified printable object within said hypertext anchor tag with a predefined indication of the hypertext link including printing a corresponding uniform resource locator (URL) for each external hypertext link.

Applicants respectfully submit that the rejection of claims 1-2, 6 and 14 under 35 USC 103 is incorrect, the claims are directed to novel subject matter and the total teachings of the Stork et al., and Kogan et al. would not achieve the claimed invention as recited by claims 1-5 and 7.

In the words of the Court of Appeals for the Federal Circuit, "The mere fact that the prior art may be modified in the manner suggested by the Examiner does not make the modification obvious unless the prior art suggested the desirability of the modification." In re John R. Fritch, 972 F.2d 1260, 1266, 23 USPQ2d 1780 (Fed. Cir. 1992). The mere fact that the prior art could be modified so as to result in the combination defined by the claims would not have made the modification obvious unless the prior art suggests the desirability of the modification. See In re Gordon and Sutherland, 733 F.2d 900, 221 USPQ 1125, 1127 (Fed. Cir. 1984), Carl Schenck, A.G. v. Nortron Corp., 713 F.2d 782, 787, 218 USPQ 698, 702 (Fed. Cir. 1983), and In re Sernaker, 702 F.2d 989, 995-96, 217 USPQ 1, 6-7 (Fed. Cir. 1983). Applicant respectfully submits that the prior art description of Stork et al., and Kogan et al. falls short of applicant's invention, and the subject matter of the claimed invention as recited in claim 1 would not have been obvious to one of ordinary skill in the art in view of the references of record.

Stork et al. teach the use of encoded, machine-readable information to enable hypertext documents to be created automatically, without user interaction.

Kogan et al. teach the use of anchors together with the creation of intermediate tables that maintain information about relationships between regions of documents, and Kogan et al. add nothing to render obvious the claimed invention. The publications Microsoft Word Tutorial "Microsoft Word Basic Features" and Advanced Microsoft Word "Footnotes and Endnotes" add nothing to suggest the invention of claim 1. In the cited references, there is no hint of any mechanism or reason for sequentially checking

printable objects to identify each printable object within a hypertext anchor tag; nor for rendering each identified printable object within said hypertext anchor tag with a predefined indication of the hypertext link including printing a corresponding uniform resource locator (URL) for each external hypertext link as taught and claimed by Applicants. A combination of all the teachings of the references of record would not achieve the claimed invention as recited by claim 1.

Thus, independent claim 1 is patentable and dependent claims 2, 6 and 14 are patentable.

## Claims 3, 12 and 16 are patentable

Applicant respectfully submits that representative claim 3 is patentable over Stork et al., and Kogan et al. for the same reasons as claim 1.

Representative claim 3 further defines that the method of claim 1 includes the step responsive to identifying said local hypertext link, printing said identified page number for said local hypertext link with said printable object.

The total teachings of Stork et al., and Kogan et al. do not provide any remote suggestion of or any incentive for the recited step of responsive to identifying said local hypertext link, printing said identified page number for said local hypertext link with said printable object. Thus, dependent claim 3 is patentable and dependent claims 12 and 16 are patentable over all the references of record.

### Claim 10 is patentable

Independent claim 10 is submitted to be separately patentable because claim 10 recites apparatus for identifying hypertext links in document printouts

comprising: a stored document data, said document data including each local hypertext link name and a page number for each said local hypertext link name; and a printing program utilizing said stored document data for printing a document including a predefined indication of each hypertext link within the document to be printed including a corresponding uniform resource locator (URL) printed for each external hypertext link. The subject matter of independent claim 10, neither the document data nor the printing program, is not described, nor suggested in the references of record including Stork et al., and Kogan et al. Thus, applicant respectfully submits that independent claim 10 clearly is patentable.

#### Claim 13 is patentable

Independent claim 13 recites a computer program product for implementing document printing including identification of hypertext links comprising: a recording medium; means, recorded on the recording medium, for sequentially checking printable objects to identify each printable object within a hypertext anchor tag; and means, recorded on the recording medium, for rendering each identified printable object within said hypertext anchor tag with a predefined indication of the hypertext link including means, recorded on the recording medium, for printing a corresponding uniform resource locator (URL) for each external hypertext link.

There is no hint of any such computer program product as recited by independent claim 13 in the references of record. Independent claim 13 is patentable for the same reasons discussed above relative to independent claim 1 because claim 13 recites means, recorded on said recording medium, for sequentially checking

printable objects to identify each printable object within a hypertext anchor tag.

Independent claim 13 is patentable because claim 13 further recites means, recorded on said recording medium, for for rendering each identified printable object within said hypertext anchor tag with a predefined indication of the hypertext link including means, recorded on the recording medium, for printing a corresponding uniform resource locator (URL) for each external hypertext link. These limitations are not suggested by the total teaching of Stork et al., and Kogan et al.

The subject matter of dependent claim 13 is not described, nor suggested in Stork et al., and Kogan et al. Thus, applicant respectfully submits that claim 13 clearly is patentable.

#### Claim 17 is patentable

Independent claim 17 recites a computer implemented method for identifying hypertext links in document printouts comprising the steps of: scanning a document to be printed and identifying local hypertext links within the document, computing and storing a page location of each identified local hypertext link within the document, sequentially checking printable objects to identify each printable object within a hypertext anchor tag; and rendering each identified printable object within said hypertext anchor tag with a predefined indication of the hypertext link.

Applicant respectfully submits that there is no hint of the method as recited by independent claim 17 in the references of record.

Independent claim 17 is patentable because claim 17 recites the steps of sequentially checking printable objects to identify each printable object within a

hypertext anchor tag; and rendering each identified printable object within said hypertext anchor tag with a predefined indication of the hypertext link. These limitations are not disclosed, nor remotely suggested by the total teaching of Stork et al., and Kogan et al.

The subject matter of dependent claim 17 is not described, nor suggested in Stork et al., and Kogan et al. Thus, applicant respectfully submits that claim 17 clearly is patentable.

# D. THE REJECTIONS OF CLAIMS 4, 5, 7, 8, and 9 SHOULD BE REVERSED

The Board should reverse the rejections of claim 4, 5, and 8, and of 7 and 9 as being unpatentable Stork et al. and Kogan et a. respectively in view of Microsoft Word Tutorial "Microsoft Word Basic Features" and Advanced Microsoft Word "Footnotes and Endnotes" under 35 U.S.C. § 103.

## Claims 4, 5, 7, 8, and 9 are patentable

Each of the dependent claims 4, 5, 7, 8, and 9 is patentable for the same reasons discussed above relative to claim 1. Representative claim 4 is submitted to be separately patentable because claim 4 further defines that the step of printing said identified page number for said local hypertext link with said printable object includes the step of printing said identified page number in superscript form. The subject matter of dependent claim 4 is not described, nor suggested in the references of record including the Microsoft Word publications. The Microsoft Word publications add nothing to render obvious the further defined methods for identifying hypertext links in

document printouts as defined in each of the dependent claims 4, 5, 7, 8, and 9. Thus, applicants respectfully submit that each of the dependent claims 4, 5, 7, 8, and 9 clearly is patentable.

#### E. CONCLUSION

Each of the independent claims 1, 10, 13, and 17 distinguishes over the references of record and further their subject matter as a whole would not have been obvious at the time of the invention. Each of claims 1-10, 12-14 and 16-17 are patentable and the Examiner's rejections of claims 1-10, 12-14 and 16-17 under 35 U.S.C. § 103 should be reversed.

It is respectfully requested that the final rejection be reversed.

Respectfully submitted,

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#### (9) APPENDIX

#### A. CLAIMS ON APPEAL

1. (Amended) A computer implemented method for identifying hypertext links in document printouts comprising the steps of:

scanning a document to be printed and identifying local hypertext links within the document,

computing and storing a page location of each identified local hypertext link within the document,

sequentially checking printable objects to identify each printable object within a hypertext anchor tag; and

rendering each identified printable object within said hypertext anchor tag with a predefined indication of the hypertext link including printing a corresponding uniform resource locator (URL) for each external hypertext link.

- 2. (Amended) The computer implemented method for identifying hypertext links in document printouts as recited in claim 1 wherein the step of rendering each identified printable within said hypertext anchor tag with said predefined indication of the hypertext link includes the steps of checking whether each said identified printable object within said hypertext anchor tag is a local hypertext link.
- 3. (Twice Amended) The computer implemented method for identifying hypertext links in document printouts as recited in claim 2 includes responsive to

identifying said local hypertext link, printing said identified page number for said local hypertext link with said printable object.

- 4. (Amended) The computer implemented method for identifying hypertext links in document printouts as recited in claim 3 wherein the step of printing said identified page number for said local hypertext link with said printable object includes the step of printing said identified page number in superscript form.
- 5. (Amended) The computer implemented method for identifying hypertext links in document printouts as recited in claim 3 wherein the step of printing said identified page number for said local hypertext link with said printable object includes the step of printing said identified page number in bold form.
- 6. (Amended) The computer implemented method for identifying hypertext links in document printouts as recited in claim 1 wherein the step of rendering each identified printable object within said hypertext anchor tag with said predefined indication of the hypertext link including printing said corresponding uniform resource locator (URL) for each said external hypertext link includes the steps of checking whether each said identified printable object within said hypertext anchor tag is an external hypertext link.
- 7. (Amended) The computer implemented method for identifying hypertext links in document printouts as recited in claim 6 wherein the step of printing said uniform resource locator (URL) for said external hypertext link is responsive to identifying said external hypertext link, and includes the steps of printing said uniform

resource locator (URL) for said external hypertext link in a footnote for said printable object.

- 8. (Amended) The computer implemented method for identifying hypertext links in document printouts as recited in claim 1 wherein the step of printing said uniform resource locator (URL) for said external hypertext link includes the step of printing said uniform resource locator (URL) in superscript form.
- 9. (Amended) The computer implemented method for identifying hypertext links in document printouts as recited in claim 1 wherein the step of printing said uniform resource locator (URL) for said external hypertext link includes the step of printing said uniform resource locator (URL) in bold form.
- 10. (Amended) Apparatus for identifying hypertext links in document printouts comprising:

a stored document data, said document data including each local hypertext link name and a page number for each said local hypertext link name; and

a printing program utilizing said stored document data for printing a document including a predefined indication of each hypertext link within the document to be printed including a corresponding uniform resource locator (URL) printed for each external hypertext link.

12. Apparatus for identifying hypertext links in document printouts as recited in claim 10 wherein said predefined indication of each hypertext link within the document to be printed includes a corresponding page number printed for each local hypertext link.

13. (Amended) A computer program product for implementing document printing including identification of hypertext links comprising:

a recording medium;

means, recorded on the recording medium, for sequentially checking printable objects to identify each printable object within a hypertext anchor tag; and

means, recorded on the recording medium, for rendering each identified printable object within said hypertext anchor tag with a predefined indication of the hypertext link including means, recorded on the recording medium, for printing a corresponding uniform resource locator (URL) for each external hypertext link.

- 14. A computer program product for implementing document printing including identification of hypertext links as recited in claim 13 includes means, recorded on the recording medium, for scanning a document to be printed and for identifying local hypertext links within the document, and means, recorded on the recording medium, for computing and storing a page location of each identified local hypertext link within the document.
- 16. A computer program product for implementing document printing including identification of hypertext links as recited in claim 14 wherein said means, recorded on the recording medium, for rendering each identified printable object within said hypertext anchor tag with a predefined indication of the hypertext link includes means, recorded on the recording medium, for printing said page number for each local hypertext link.

17. A computer implemented method for identifying hypertext links in document printouts comprising the steps of:

scanning a document to be printed and identifying local hypertext links within the document,

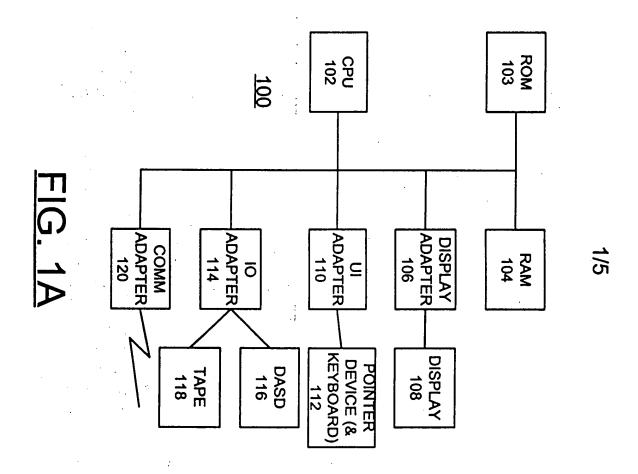
computing and storing a page location of each identified local hypertext link within the document,

sequentially checking printable objects to identify each printable object within a hypertext anchor tag; and

rendering each identified printable object within said hypertext anchor tag with a predefined indication of the hypertext link.



# **B. DRAWINGS OF INVENTION**





# FIG. 1B

**DOCUMENT DATA 200** 

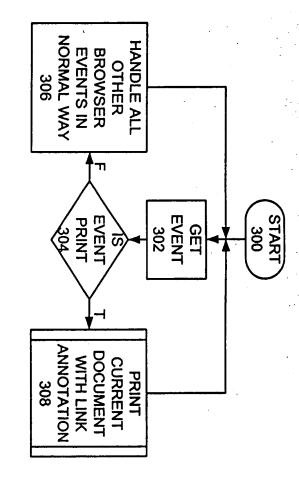


FIG.3

